

# **EXHIBIT E**

Pierandrea Galli

1/28/2008

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TOPP

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ESTER LORUSSO,

Plaintiff,

-against-

1:07 CV 03583-LBS

ALITALIA-LINEE AEREE ITALIANE, SpA,

Defendant.

-----x

DEPOSITION OF PIERANDREA GALLI

Monday, January 28, 2008

New York, New York

REPORTED BY:

Holly Hough

Pierandrea Galli

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2 Marketing?

3 A. It is above the position.

4 Q. Above?

5 A. Yes.

6 Q. What was your title when you were in New  
7 York in 2003-2004?

8 A. I was Managing Director for the Americas.

9 Q. What were your duties then?

10 A. I was responsible for what are the sales  
11 and for North America, Central and South America.

12 Q. Does Ester LoRusso still work at Alitalia?

13 A. No.

14 Q. Do you know why she doesn't?

15 A. She is not working anymore with Alitalia.

16 Q. What led to her departure?

17 A. What?

18 Q. What led to her departure?

19 A. Can you repeat, what?

20 Q. What led to her departure from the  
21 company?

22 A. It was the cancellation of the position.

23 Q. What do you mean by that?

24 MR. KORAL: The position?

25 A. The position. So the position that she

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2 was, that she had been in New York, it was no more  
3 there.

4 Q. What position was that?

5 A. It was responsible for marketing Cargo.

6 Q. What happened to that position?

7 A. It was canceled.

8 Q. By whom?

9 A. By the responsible of Cargo there at that  
10 time.

11 Q. Who was that?

12 A. Marco D'Ilario.

13 Q. Could you spell that?

14 A. M-a-r-c-o D-'-I-l-a-r-i-o.

15 Q. Marco?

16 A. Yes.

17 Q. Marco canceled Ms. LoRusso's position in  
18 Cargo, right?

19 A. Yeah.

20 Q. When did he do that?

21 A. Beginning of maybe 2007, 2007, yeah.

22 Q. Do you know why Marco did that?

23 A. Because it was the policy to have  
24 centralized the marketing position, and then all the  
25 position abroad, they were canceled.

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2 Q. And what happened to the position?

3 A. Which one?

4 Q. Ester's position.

5 A. It was no more there.

6 Q. Who did the work she used to do?

7 A. Nobody is doing this kind of job.

8 Centralized all in Rome.

9 Q. Did someone in Rome take over her duties?

10 A. Not as specifically.

11 Q. Did something happen with Cargo in 2007

12 where they were centralizing all of the marketing

13 work?

14 A. Yeah, there was reorganize all the Cargo  
15 Division, and there was centralized some activities  
16 and some position were canceled, and there was a  
17 kind of retrenchment of the Cargo organization.

18 Q. What did Marco do for Alitalia?

19 MR. KORAL: Objection.

20 A. When?

21 Q. At the time he decided to cancel Ester  
22 LoRusso's job.

23 A. He was head of International Sales.

24 Q. Of Alitalia or --

25 A. Alitalia Cargo.

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2 A. Yes.

3 Q. What does that mean?

4 A. Means selling ticket, maybe to people that  
5 wanted to go to Italy. And normally they are  
6 ex-Italian or have some friends or relatives in  
7 Italy, so it's this kind of traffic.8 Q. When you say ethnic traffic, people  
9 coming -- where do the people live who you were  
10 marketing to?11 A. In the U.S. And they want to go to Italy  
12 to visit friends, relatives.13 Q. You're saying that, if I understand you  
14 right here, GA 2000 markets to people in America who  
15 have connections to Italy; is that right?16 A. Either people directly or travel agent  
17 that handle this kind of traffic.18 Q. What happened to Ester's position with  
19 that company?

20 A. The company was closed in 2005.

21 Q. Who closed it? Who closed GA 2000?

22 A. It was a decision made in New York and  
23 approved by Rome.

24 Q. Who in New York made the decision?

25 A. It was a decision between Mr. Libutti,

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2 Mr. Gallo was also present of GA 2000, and  
3 Mr. Marchese was the financial controller.

4 Q. You said Mr. Gallo?

5 A. Yes.

6 Q. And Mr. Libutti?

7 A. Yes.

8 Q. Those two men, along with Mr. Marchese,  
9 you said?

10 A. Marchese, yes.

11 Q. Those three men decided in 2005 to close  
12 GA 2000?

13 A. They proposed to close GA 2000 to Rome.

14 Q. Was it approved?

15 A. Yes.

16 Q. Do you know why these three men decided to  
17 close GA 2000?

18 A. Because the company was losing money.

19 Q. What company was losing money?

20 A. GA 2000 was losing money. And there was  
21 no more commercial need to have a subsidiary  
22 handling ethnic traffic.

23 Q. What happened to Ester's job when GA 2000  
24 was closed?

25 A. She came, she had, she moved to GA 2000,

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2 was doing; do you have any knowledge of it?

3 A. No.

4 Q. So you had no idea how Ester LoRusso was  
5 performing?

6 A. No.

7 Q. What happened to that position she had,  
8 Director of Marketing and Communications?

9 A. Which one?

10 Q. You said that in 2004 she was holding a  
11 position called Director of Marketing  
12 Communications; is that right?

13 A. Uh-huh.

14 Q. What happened to that job?

15 A. It was, it was not anymore the same, the  
16 same span of this job because, again, was  
17 communication was handled directly in Rome,  
18 centralized. It was no more the same, the same  
19 position.

20 Q. How did it change?

21 A. Huh?

22 Q. How did it change?

23 A. Because was centralized, activities were  
24 centralized into Passenger.

25 Q. What is that?

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2           A. Because all this kind of activity, so  
3         advertising and relation with advertising agency was  
4         centralized in Rome, and so they were taking care in  
5         Rome for the contract and for everything.

6           Q. Were all of her responsibilities as  
7         Director of Marketing Communications transferred to  
8         Rome?

9           A. Mainly the one regarding advertising and  
10         relation with advertising agency.

11          Q. So only that part of her job was  
12         transferred to Rome?

13          A. Yes.

14          Q. Was any other part of her job transferred  
15         to Rome?

16          A. No.

17          Q. So what part of her job stayed in New  
18         York?

19          A. Sales promotion, and I think that she was  
20         managing customer relation, and that's it.

21          Q. So how would you break down her -- you  
22         identified three different parts of her job just  
23         now?

24          A. Uh-huh.

25          Q. One was advertising, right?

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Q. Elizabeth Santella. What was Ms.

3

Santella's title?

4

5

A. She was, I don't know if she was a manager or not. She handled sales promotion.

6

7

Q. What kind of work was involved in sales promotion?

8

A. What?

9

10 Q. What kind of work was involved in the sales-promotion part of Ms. LoRusso's job?

11 A. Preparing giveaways, preparing a lot of sales request as brochure, or if there's an event in the States that they have to organize, and that's 12 13 14 the sales-promotion activity.

15

16 Q. Do you know if anyone other than Ms. Santella helped Ms. LoRusso in the sales promotion?

17

MR. KORAL: Objection.

18

A. I don't know.

19

20 Q. What about the advertising part of Ms. LoRusso's job, what was that? What kind of work did 21 she do?

22

23 A. Be in contact with advertising agent in order to perform campaign and advertising for the 24 company.

25

Q. When was the advertising work transferred,

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2 centralized, to Rome?

3 A. Something around 2004, I think.

4 Q. Do you know what month?

5 A. No, not exactly.

6 Q. Was it spring, fall, winter or summer?

7 A. Maybe fall.

8 Q. Why did that happen?

9 A. It was a decision of the Marketing

0 Department in Rome to centralize.

1 Q. Who made that decision?

2 A. The head of the marketing in Rome.

3 Q. Who was that?

4 A. Mr. Zeni, Z-e-n-i.

5 Q. Z--

6 A. Z-e-n-i.

7 Q. What was his title again?

8 A. It was the Senior Vice President,

9 Marketing and Business Strategies.

0 Q. He was based in Rome?

1 A. Yes.

2 Q. And he made a decision sometime in '04 to

3 centralize the advertising back to Rome?

4 MR. KORAL: Objection.

5 A. Yes.

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2 responsibilities.

3 Q. You took on bigger responsibilities?

4 A. Sorry?

5 Q. You just said you took on bigger  
6 responsibilities?

7 A. Yes.

8 Q. Do you know what happened to Ms. LoRusso's  
9 employment with Alitalia in 2004?

10 A. No.

11 Q. Do you know if it changed in 2004?

12 A. What do you mean?

13 Q. You just told me that she went to work for  
14 GA 2000.

15 A. Yeah.

16 Q. That was in 2005, right?

17 MR. KORAL: Objection.

18 A. I don't remember when it was, something  
19 between 2004 and 2005.

20 Q. Why did she start working in GA 2000?

21 A. The company, the company in New York made  
22 an offer to her to have this position in GA 2000,  
23 and she accepted, as far as I know.24 Q. Okay. But her position with Alitalia  
25 though in 2004 was not eliminated, correct?

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2           Q.    Okay. Did an employee at Alitalia have  
3       some type of pension benefit that was triggered by  
4       being 55 years old or being at the company for 15  
5       years?

6           MR. KORAL: Objection.

7           A.    I don't know.

8           Q.    What was the purpose of the early-  
9       retirement program?

10          A.    It's to, let's say, considering the  
11       retrenchment of the company to give a possibility  
12       for the people to live, accepting the plan, instead  
13       of fire people.

14          Q.    You said there was a retrenchment going  
15       on?

16          MR. KORAL: Objection.

17          A.    Yeah, the reduction was the reduction in  
18       the number of employees all over the world for  
19       Alitalia due to bad condition of the company.

20          Q.    How did that affect the New York office?

21          A.    Like all the other offices.

22          Q.    What do you mean?

23          A.    That were reduction in number of employee.

24          Q.    Did anyone in New York get fired?

25          MR. KORAL: Objection.

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2 A. More or less.

3 Q. Pretty much the same, as far as you know?

4 A. Yes.

5 Q. In February 2004 --

6 A. February.

7 Q. -- 2004, you were there then, right?

8 A. Yes.

9 Q. Do you know that Ms. LoRusso's position or  
10 her title was changed slightly then?

11 A. I don't remember.

12 Q. From Director of Marketing Communications  
13 to just Director of Marketing?

14 A. I don't remember.

15 Q. You don't remember that. When did  
16 Alitalia decide to centralize Alitalia's operations  
17 to Rome?

18 MR. KORAL: Objection.

19 A. Can you be more specific?

20 Q. Sure. You mentioned that some of Ms.  
21 LoRusso's duties in the advertising part were  
22 centralized to Rome, right?

23 MR. KORAL: Objection.

24 Q. Is that right?

25 A. Yeah.

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2 Q. When was that decision made?

3 A. I already answered, it was in 2004.

4 Q. But you don't know when in 2004?

5 A. Yeah.

6 Q. During that time, was there a larger plan  
7 in Alitalia to centralize operations in Rome?

8 A. Advertising for sure, and that's it.

9 Q. So why did Mr. Libutti leave Alitalia?

10 A. Pardon?

11 Q. Why did Mr. Libutti leave Alitalia?

12 A. There was a decision made by the company  
13 to, and he accepted to leave Alitalia.

14 Q. You don't know why?

15 A. I was not involved.

16 Q. How long have you worked for Alitalia?

17 A. How long?

18 Q. Yes.

19 A. Almost 20 years.

20 Q. In 2004, when the advertising part of Ms.  
21 LoRusso's job was centralized to Rome from New York,  
22 were any other parts of the New York operations or  
23 responsibilities transferred to Rome?

24 MR. KORAL: Objection.

25 A. Not in 2004.